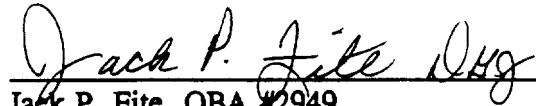


EXHIBIT A

- 2.1 Please identify by date and company name each company that has made a request to SWBT for local interconnection and/or resale in Oklahoma.

Respectfully submitted,



Jack P. Fite, OBA #2949
Jay M. Galt, OBA #3220
Marjorie McCullough, OBA #15377
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& WULFF, L.L.P.
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Phone (512) 322-9044
Fax (512) 322-9020

**ATTORNEYS FOR AT&T COMMUNICATIONS
OF THE SOUTHWEST, INC.**

Dated: April 1, 1997

CERTIFICATE OF MAILING

This is to certify that on this 1st day of April, 1997, a true and correct copy of the above and foregoing AT&T Communications of the Southwest, Inc. Second Requests for Information was mailed, postage prepaid to:

Robert E. Goldfield
Administrative Law Judge
Oklahoma Corporation Commission
Jim Thorpe Office Bldg.
First Floor
Oklahoma City, OK 73105

John W. Gray
Senior Assistant General Counsel
Oklahoma Corporation Commission
P. O. Box 52000-2000
Oklahoma City, OK 73152-2000

Ernest G. Johnson, Director
Public Utility Division
Oklahoma Corporation Commission
P. O. Box 52000-2000
Oklahoma City, OK 73152-2000

Maribeth D. Snapp
Deputy General Counsel
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Roger Toppins
800 North Harvey
Oklahoma City, OK 73102

Rick Chamberlain
Mickey Moon
Assistant Attorneys General
Office of the Attorney General
112 State Capitol Building
2300 North Lincoln Boulevard
Oklahoma City, OK 73105-4894

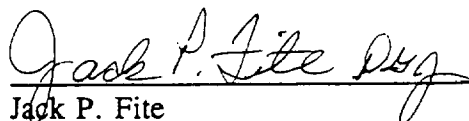
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Nancy M. Thompson, Esq.
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Martha Jenkins
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Kansas City, MO 64114

Ed Cadieux
Brooks Fiber Properties
425 Woodsmill Road South
Suite 300
Town & Country, MO 63017

Fred Gist
100 North Broadway, Suite 2900
Oklahoma City, OK 73102


Jack P. Fite



FILED

APR - 1 1997

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA
COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

APPLICATION OF ERNEST G.
JOHNSON, DIRECTOR OF THE
PUBLIC UTILITY DIVISION,
OKLAHOMA CORPORATION
COMMISSION TO EXPLORE THE
REQUIREMENTS OF SECTION 271
OF THE TELECOMMUNICATIONS
ACT OF 1996.

§
§
§
§
§
§
§
§

Cause No. PUD 970000064

AT&T'S WITNESS LIST

Pursuant to Order No. 409904, AT&T Communications of the Southwest, Inc.
("AT&T") submits the following list of witnesses who have prefiled testimony and who will be
tendered for cross-examination at the hearing scheduled to begin on April 14, 1997.

Robert Falcone

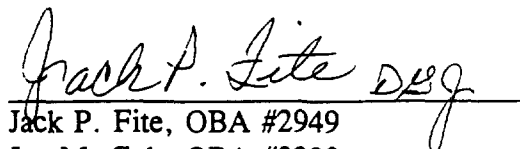
Steven Turner

Nancy Dalton

Mark Lancaster

Phillip Gaddy

Respectfully submitted,



Jack P. Fite, OBA #2949

Jay M. Galt, OBA #3220

Marjorie McCullough, OBA #15377

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State Bar No. 11998600
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& WULFF, L.L.P.
2700 One Dallas Centre
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Dallas, Texas 75201-4283
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Facsimile: (214) 969-0430

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SMITH, MAJCHER & MUDGE, L.L.C.
816 Congress Avenue
Suite 1270
Austin, Texas 78701
Phone (512) 322-9044
Fax (512) 322-9020

**ATTORNEYS FOR AT&T COMMUNICATIONS
OF THE SOUTHWEST, INC.**

Dated: April 1, 1997

CERTIFICATE OF MAILING

This is to certify that on this 1st day of April 1997, a true and correct copy of the above and foregoing AT&T Communications of the Southwest, Inc. Witness list was mailed, postage prepaid to:

Robert E. Goldfield
Administrative Law Judge
Oklahoma Corporation Commission
Jim Thorpe Office Bldg.
First Floor
Oklahoma City, OK 73105

John W. Gray
Senior Assistant General Counsel
Oklahoma Corporation Commission
P. O. Box 52000-2000
Oklahoma City, OK 73152-2000

Ernest G. Johnson, Director
Public Utility Division
Oklahoma Corporation Commission
P. O. Box 52000-2000
Oklahoma City, OK 73152-2000

Maribeth D. Snapp
Deputy General Counsel
Oklahoma Corporation Commission
P. O. Box 52000-2000
Oklahoma City, OK 73152-2000

Roger Toppins
800 North Harvey
Oklahoma City, OK 73102

Rick Chamberlain
Mickey Moon
Assistant Attorneys General
Office of the Attorney General
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2300 North Lincoln Boulevard
Oklahoma City, OK 73105-4894

Ronald E. Stakem
Clark, Stakem, Wood & Pherigo, P.C.
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Oklahoma City, OK 73102

Nancy M. Thompson, Esq.
P.O. Box 18764
Oklahoma City, OK 73154

Martha Jenkins
Sprint Communications Company, L.P.
8140 Ward Parkway 5E
Kansas City, MO 64114

Ed Cadieux
Brooks Fiber Properties
425 Woodsmill Road South
Suite 300
Town & Country, MO 63017

Fred Gist
100 North Broadway, Suite 2900
Oklahoma City, OK 73102

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

FILED
APR - 2 1997

APPLICATION OF ERNEST G. JOHNSON,)
DIRECTOR OF THE PUBLIC UTILITY)
DIVISION, OKLAHOMA CORPORATION)
COMMISSION TO EXPLORE THE)
REQUIREMENTS OF SECTION 271 OF)
TELECOMMUNICATIONS ACT OF 1996.)

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

CAUSE NO. PUD 970000064

**SOUTHWESTERN BELL TELEPHONE COMPANY'S OPPOSITION
TO MOTION TO TAKE DEPOSITIONS OUT OF TIME**

Southwestern Bell Telephone Company opposes AT&T's motion to take depositions. The motion ignores the very carefully constructed procedural schedule that was developed in this case during a prehearing conference on February 19, 1997. A copy of the procedural schedule is attached hereto as Attachment "A."

AT&T's motion is entirely based on a false premise — that "AT&T was advised for the first time on Monday, March 24, 1997," that Southwestern Bell does not intend to produce witnesses at the hearing on April 14-16. AT&T uses this false premise to try and justify a motion to ignore the Commission's rules¹ and the procedural schedule.

As the ALJ and all the parties remember, when the parties met with the ALJ on February 19, Southwestern Bell's position was very clear — it requested a schedule that provided for the filing of written comments. Other parties requested the opportunity to file prefiled testimony. Mr. Gray offered the compromise suggestion, which was adopted by the

¹ The Commission's rule on depositions (OAC 165:5-11-1), a copy of which is attached hereto as Attachment "B," provides that a party may only take a deposition upon motion and following the issuance of an order by the Commission. The rule also requires "at least five (5) days" prior notice to the date scheduled for taking the deposition. AT&T's motion seeks to ignore all of these rules.

ALJ, that parties be permitted to file comments *or* prefiled testimony, at each party's discretion. It was made very clear at that time that Southwestern Bell did not intend to file prefiled testimony or call witnesses, but would rely on the contents of its draft Section 271 filing package that was provided to parties and the ALJ on February 20, 1997, along with written comments (which were filed on March 11 and March 25).² AT&T tries to mislead the Commission when it totally ignores what transpired at the prehearing conference.

Further evidence that AT&T's motion is based on a false premise is the fact that on March 11, Southwestern Bell did not file prefiled testimony, but — as it indicated on February 19 it would do — filed only written comments. At that time, AT&T should have known that witnesses would not be called by Southwestern Bell and, in fact, could not be called. It is disingenuous to say the least for AT&T to claim that it didn't know of Southwestern Bell's plans until two weeks later.

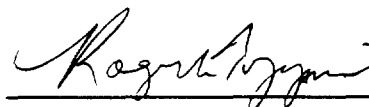
In addition to the foregoing, AT&T should not be permitted to ignore the Commission's rules and the procedural schedule that was adopted in this case, because that schedule was specifically constructed to allow parties to gather information through data requests and meetings with Southwestern Bell's subject matter experts. It was very clear to all who attended the February 19 prehearing conference that depositions were discouraged and were not to be taken at all without an order of the Commission. It was also very clear

² In a letter of March 26, 1997, the undersigned explained all of this to AT&T's Texas counsel, who was not in attendance at the February 19 prehearing conference and who may not have been aware that Southwestern Bell announced as early as that date that it did not intend to call witnesses. This letter is attached as Attachment "C." Despite this letter, AT&T persisted in filing a motion for depositions and continued to assert, falsely, that AT&T was not aware of Southwestern Bell's intentions until March 24.

that depositions were to be taken as a last resort, only after data requests were utilized and after the process of Southwestern Bell making subject matter experts available were exhausted. AT&T, however, made its late, out-of-time request for depositions, before serving any data requests on Southwestern Bell and without at all utilizing the procedures that were set forth in the procedural schedule whereby Southwestern Bell agreed, upon sufficient notice, to make its subject matter experts available. Instead, after ignoring those discovery mechanisms completely, AT&T seeks to take multiple, and in some cases simultaneous, depositions, after the close of discovery, on notice much shorter than provided for in the Commission's rules.

The procedural schedule was developed after considerable discussion with the parties, including AT&T and the ALJ, on February 19. AT&T has been aware of the provisions of that schedule since February 19 and has also been aware since then that Southwestern Bell did not intend to call witnesses. It should not now be permitted to ignore all of this and raise a *false* claim that it did not know until March 24 that Southwestern Bell did not intend to call witnesses as justification for violating the procedural schedule and the rules.

Respectfully submitted,



ROGER K. TOPPINS, OBA #15410
AMY R. WAGNER, OBA #14556
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Oklahoma City, OK 73102
Telephone: (405) 291-6751
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- and -

MICHAEL K. KELLOGG
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JONATHAN T. MOLOT
KELLOGG, HUBER, HANSEN,
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Washington D.C. 20005
(202) 326-7900

ATTORNEYS FOR SOUTHWESTERN BELL
TELEPHONE COMPANY

CERTIFICATE OF MAILING

On this 2^d day of April, 1997, a true and correct copy of the foregoing was mailed, postage prepaid, to:

John Gray
Oklahoma Corporation Commission
Jim Thorpe Building
Oklahoma City, OK 73105

Martha Jenkins
8140 Ward Parkway, 5E
Kansas City, MO 64114

Mickey Moon
Office of the Attorney General
112 State Capitol Building
Oklahoma City, OK 73105

Nancy Thompson
P. O. Box 18764
Oklahoma City, OK 73154-8764

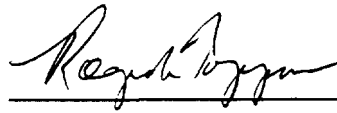
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Thomas C. Pelto
Michelle S. Bourianoff
AT&T Communications of the
Southwest
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Austin, TX 78701-2444

J. Fred Gist
HALL ESTILL HARDWICK GABLE
GOLDEN & NELSON, P.C.
100 North Broadway, Suite 2900
Oklahoma City, OK 73102

Edward J. Cadieux, Esq.
Brooks Fiber Properties, Inc.
425 Woods Mill Road South, Suite 300
Town and Country, MO 63017



BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF ERNEST G. JOHNSON,)
 DIRECTOR OF THE PUBLIC UTILITY)
 DIVISION, OKLAHOMA CORPORATION) CAUSE NO. PUD 970000064
 COMMISSION TO EXPLORE THE)
 REQUIREMENTS OF SECTION 271 OF)
 THE TELECOMMUNICATIONS ACT OF 1996)

ORDER NO. 409904

HEARING: February 19, 1997

APPEARANCES: Jack P. Fite, Attorney
 AT&T Communications of the Southwest, Inc.
 Roger K. Toppins, Attorney
 Southwestern Bell Telephone Company
 Nancy Thompson, Attorney
 Sprint Communications Company, L.P.
 Ronald D. Stakem, Attorney
 MCI Telecommunications Corporation
 Fred Gist, Attorney
 Brooks Fiber Communications
 Mickey S. Moon, Assistant Attorney General
 Office of the Attorney General, State of Oklahoma
 John Gray, Senior Assistant General Counsel, Public Utility
 Division, Oklahoma Corporation Commission

PROCEDURAL SCHEDULE

BY THE COMMISSION:

The Corporation Commission of the State of Oklahoma ("Commission") being regularly in session and the undersigned Commissioners being present and participating, there comes on before the Commission for consideration the Motion to Establish Procedural Schedule filed by AT&T Communications of the Southwest, Inc. ("AT&T").

This docket results from Section 271(d)(2)(B) of the Federal Telecommunications Act of 1996, which requires the Federal Communications Commission, before it makes a determination under Section 271 with respect to whether a Bell operating company should be authorized to provide interLATA services in an in-region state, to consult with this Commission "in order to verify the compliance of the Bell operating company with the requirements of subsection [271](c)."

Following arguments of counsel and the representations of counsel for Southwestern Bell Telephone Company ("SWBT"), that it would agree to provide the Commission and intervenors with advance notice of the latest draft of the petition and supporting documentation it intends to file with the FCC to demonstrate its compliance with Section 271(c), the Commission finds that the Procedural Schedule should be as follows:

February 20, 1997 -	SWBT to provide copy of the latest draft of its Section 271(c) petition and supporting documentation to ALJ, Staff and intervenors
March 11, 1997 -	All parties, within each party's sole discretion, may file prefiled testimony and/or written comments regarding SWBT's Section 271(c) petition and supporting documentation and issues related thereto.
March 25, 1997 -	All parties, within each party's sole discretion, may file prefiled rebuttal testimony and/or reply comments
April 1, 1997 -	Last day to submit data requests; last day for depositions; parties exchange witness lists
April 11, 1997 -	On or after this date, SWBT, at its option, may file its Section 271 petition at the FCC
April 14-16, 1997 -	Hearing before ALJ in Courtroom B
April 17, 1997 -	ALJ issues recommendation
April 22-23, 1997 -	Oral appeals, if any, before Commission <u>en banc</u>

April 23, 1997 - Commission deliberations
April 25, 1997 - On or after this date, Commission will provide
its report to the FCC pursuant to Section
271(d) (2) (B)

GENERAL PROVISIONS

1. Each party, except Staff, is limited to 30 data requests (including subparts) on SWBT or Staff. SWBT may file data requests on the other parties under the same limitation. The two Brooks Fiber companies shall be treated as one entity for purposes of this provision. Copies of data requests shall be provided to the ALJ and to the Commission Staff. The Commission Staff will review the data requests to determine whether any data request is duplicative of other requests and will advise the party to whom the data requests are submitted whether all or part of the data requests should be answered.

2. Responses to data requests shall be provided within five (5) business days from the notification of the Commission Staff as set forth above. Objections to data requests shall be submitted within four (4) days following receipt and shall be heard at the next available motions docket, unless specially set on dates agreed to by the parties. All times specified herein for filing such documents shall be determined to be 3:00 p.m., unless specified otherwise or by agreement of the parties. All data requests and responses are to be hand-delivered or faxed.

3. Data requests and other pleadings received after 3:00 p.m. shall be considered to have been received the following day.

4. Unless an objection is made and sustained at the hearing, the data requests and responses shall be entered in the record at the hearing.

5. SWBT may update and revise its Section 271 petition and supporting documentation before it is filed at the FCC.

6. Depositions may only be taken upon leave of the Commission.

7. With respect to witnesses who have prefiled testimony, if any, at the commencement of each witness's testimony, the witness shall read into the record a written summary of his/her direct and/or rebuttal prefiled testimonies, which shall be done in lieu of oral direct testimony. The written summary shall cross-reference the witness's direct and/or rebuttal testimony. After admittance of the summary and the prefiled testimony into the record and the witness is tendered for cross-examination, the witness shall be permitted to orally testify on cross- and redirect examination. Any redirect examination will be limited to issues which were raised during cross-examination. No exhibits will be introduced for the first time during redirect examination.

8. SWBT will coordinate with the other parties with respect to making available subject matter experts to informally discuss particular issues in Oklahoma City. Any disputes resulting from this provision should be brought to the ALJ for resolution.

9. The schedule established herein makes moot the Motion to Establish Advance Notice Requirement filed by AT&T herein.

ORDER

IT IS THEREFORE ORDERED that the Procedural Schedule set forth herein is approved.

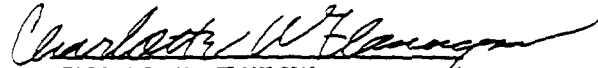
OKLAHOMA CORPORATION COMMISSION


CODY L. GRAVES, Chairman


BOB ANTHONY, Vice Chairman

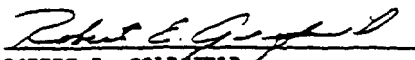

ED APPLE, Commissioner

DONE AND PERFORMED THIS 28 DAY OF FEBRUARY, 1997.
BY ORDER OF THE COMMISSION:


CHARLOTTE W. FLANAGAN, Secretary

REPORT OF THE ADMINISTRATIVE LAW JUDGE

The foregoing Findings and Order are the Report and Recommendations of the
Administrative Law Judge.


ROBERT E. GOLDFIELD
Administrative Law Judge

February 28, 1997
Date

165:5-11-1. Deposition and discovery**(a) Depositions.**

- (1) Deposition of a witness for use at a hearing may be taken only when ordered upon motion by the Commission or of a person. The order may direct that the deposition of a witness be taken inside or outside the State of Oklahoma.
- (2) The order shall state the time and place the deposition shall be taken, and the person taking the deposition shall serve a copy of the order by regular mail on each party of record at least five (5) days prior to the date scheduled for taking the deposition.
- (3) The manner of taking depositions shall otherwise be governed by the laws relating to taking of depositions for use in the District Courts of Oklahoma. Attendance of a witness for taking of his deposition shall be governed by OAC 165:5-11-3, except that the attendance of a witness for deposition shall be required only in the county of his residence.
- (4) A deposition may be offered in evidence at the hearing by any person.

(b) Production of documents.

- (1) Upon motion, the Commission may make an order requiring a person to produce designated documents or tangible objects for inspection by respondents or parties of record to the cause, or for copying at the expense of the applicant, or to be offered into evidence. The order shall direct production thereof at the hearing or at a prehearing conference, and production shall be at the principal office of the Commission unless some other place is stated in the order. An order hereunder may be directed to a person not yet a party of record, conditioned that if such person appears at the hearing, the order thereupon will be complied with.
- (2) The person applying therefor shall serve a copy of the order by regular mail on each party of record at least five (5) days prior to the date upon which production is required. In proceedings on the PUD docket, service of an order shall be made at least ten (10) business days prior to the date upon which production is required unless otherwise agreed by the applicant, respondent and intervenors.
- (3) An order pursuant to this subsection may require production of any document not privileged which constitutes or contains evidence relevant to the subject matter of the cause, or may reasonably lead to such evidence. Business records shall not be deemed privileged as such; but confidential business records and information will be protected from disclosure except where directly relevant to the issues in the cause.
- (4) The order shall identify the documents or object to be produced individually or by categories, with sufficient particularity to permit easy identification thereof by the person ordered to make production.
- (5) An exact photographic copy of a document may be substituted for the original, at the expense of the person producing the instrument.

(c) Interrogatories.

- (1) Upon motion of the Commission or of a person, an order may be entered requiring a person to answer in writing under oath certain written interrogatories attached to the order. The answers shall be submitted at the hearing or at a prehearing conference.
- (2) The person applying for the order shall serve a copy thereof, with interrogatories attached, by regular mail, upon each respondent at least ten (10) days prior to the date upon which answer is required. In proceedings on the PUD docket, service of an order shall be made at least ten (10) business days prior to the date upon which answer is required unless otherwise agreed by the applicant, respondent and intervenors.

Southwestern Bell Telephone

March 26, 1997

Roger K. Toppins
General Attorney

Kathleen M. LaValle
Cohan, Simpson, Cowlshaw & Wulfe, L.L.P.
2700 One Dallas Centre
350 N. St. Paul Street
Dallas, TX 75201-4283

Re: Cause No. PUD 970000064

Dear Ms. LaValle:

Thank you for your telephone call of March 24 and your fax of March 25. I apologize for not responding yesterday, but I was involved in making our filing in this docket.

After our conversation Monday, I have visited with my client and have also reviewed the procedural schedule in this case regarding the taking of depositions.

I do not recall that you attended the February 19 hearing where we set the procedural schedule so you may not be aware of the rather extensive discussion we had at that time with Judge Goldfield regarding discovery in this docket and the taking of depositions in particular. In our view, there was a clear understanding that there were at least three prerequisites before any deposition could be taken. First, parties were to seek needed information through data requests. We have received no data requests from AT&T. Second, parties were allowed to request that Southwestern Bell produce subject matter experts informally on a mutually agreeable schedule. We have received no such request from AT&T. Third, since depositions are practically never taken in Commission dockets and since the schedule in this docket is aggressive and provides for other discovery mechanisms (data requests and informal "technical" meetings with the subject matter experts), the ALJ ordered that no depositions could be taken without leave of the Commission. Leave of the Commission has not been sought by AT&T to take any deposition so far as I am aware.

One Bell Central
800 North Harvey, Room 310
Oklahoma City, OK 73102

Phone 405 291-6751
Fax 405 236-7773

The Commission's rule regarding the taking of depositions is consistent with the ALJ's ruling. It requires an order of the Commission following the filing of a motion of a party. No motion to take a deposition has been filed. Furthermore, the Commission's rule requires that if a motion for a deposition is sustained and an order is issued by the Commission, the party seeking the deposition must provide five (5) days notice.

The identity of the Southwestern Bell individuals who prepared affidavits for filing with the FCC was disclosed to AT&T more than a month ago. It was made clear to AT&T as far back as February 19 when the parties met with the ALJ to set the procedural schedule, that Southwestern Bell intended to file written comments, as the procedural schedule permits, and not prefiled testimony.

In our view, if the proper procedures had been filed, any questions you have for the individuals listed in your March 25 letter would first have been posed through data requests or through the process of meeting with those individuals as provided in the procedural schedule. If those procedures had been followed and AT&T still wanted to pursue the taking of depositions, AT&T had more than adequate time to file a motion for leave to take depositions, giving all the lawfully required time for notice of the motion (5 days) and notice of the depositions (5 days).

In our view, the procedural schedule was not established with the idea that parties could wait until the eve of the close of discovery, when appropriate and lawfully required notice cannot be provided, to suddenly start taking numerous, time-consuming depositions. We cannot agree to extend the April 1 discovery deadline.

Finally, with respect to your comment regarding the burden of proof in this case and how the hearing itself will be conducted, you were not at the February 19 hearing where this was discussed, but it was very clear that parties were free to file either prefiled testimony or written comments, at each party's sole discretion. It was also clear that a party that chose to file prefiled testimony subjected its witnesses to possible cross-examination at the hearing, but that parties that chose to file written comments instead of prefiled testimony would have no witnesses to be cross-examined. The affidavits attached to Southwestern Bell's draft 271 filing were prepared by the individuals involved for the purpose of the FCC 271 proceeding, not as prefiled testimony in this case. In fact, since those individuals did not file prefiled testimony in this docket (which should be no surprise to AT&T since

it was made very clear at the February 19 hearing that Southwestern Bell intended to file written comments), it is extremely unlikely that the ALJ would permit them to take the stand at the hearing for any purpose.

I believe that if you consult with Mr. Fite, who attended the February 19 hearing, he will confirm the contents of this letter and can provide you with copies of the relevant Commission rules.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Roger K. Toppins".

ROGER K. TOPPINS
RKT:hls

cc: Mr. Fite
Mr. Gray

P.S. This letter was prepared before receipt of your fax today, but I believe it responds to that fax as well.



BEFORE THE CORPORATION COMMISSION OF THE
STATE OF OKLAHOMA


FILED
APR - 2 1997
COURT CLERK'S OFFICE - OKLAHOMA
CORPORATION COMMISSION
OF OKLAHOMA

APPLICATION OF ERNEST G. JOHNSON,)
DIRECTOR OF THE PUBLIC UTILITY)
DIVISION, OKLAHOMA CORPORATION) CAUSE NO. PUD 970000064
COMMISSION TO EXPLORE THE)
REQUIREMENTS OF SECTION 271 OF)
THE TELECOMMUNICATIONS ACT OF 1996)

WITNESS LIST OF SPRINT COMMUNICATIONS COMPANY L.P.

Sprint Communications Company L.P. ("Sprint") gives notice to the parties that it will call two witnesses in this case. Those witnesses are Edward K. Phelan and Cynthia K. Meyer, the individuals who filed testimony on behalf of Sprint on March 11, 1997.

Respectfully submitted,


Nancy M. Thompson
P.O. Box 18764
Oklahoma City, Oklahoma 73154
(405) 843-3396

and

Martha Jenkins
8140 Ward Parkway, 5E
Kansas City, MO 64114
(913) 624-6184

Attorneys for Sprint Communications Company L.P.

Certificate of Service

on 4/1/97

I hereby certify that a copy of the witness list of Sprint was faxed to Roger Toppins, SWBT, Ron Stakem, MCI, Mickey Moon, Assistant Attorney General, Ed Cadieux, Brooks Flber, Kendall Parrish, Cox Communications, Kathleen LaValle, AT&T, and John Gray, Oklahoma Corporation Commission.

Nancy Thompson
Nancy M. Thompson

FILED

APR - 3 1997

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA
COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

APPLICATION OF ERNEST G. JOHNSON,)
DIRECTOR OF THE PUBLIC UTILITY)
DIVISION, OKLAHOMA CORPORATION)
COMMISSION TO EXPLORE THE)
REQUIREMENTS OF SECTION 271 OF)
THE TELECOMMUNICATIONS ACT OF 1996.)

Cause No. PUD 970000064

MOTION TO COMPEL

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and requests the Commission to compel answers to Requests for Information submitted to Southwestern Bell Telephone Company ("SWBT").

On March 26, 1997, AT&T made requests for information to SWBT (Attached).

On March 31, 1997, AT&T received a letter from SWBT's counsel objecting to certain RFIs and objecting to the number of RFIs which were requested.

AT&T request the Commission to compel the answers to RFIs objected to by SWBT and, if it is determined that, as stated by SWBT, there are actually 38 requests rather than 30, AT&T would request that SWBT be compelled to answer the additional eight RFIs. Such a request is not burdensome.

WHEREFORE, AT&T requests the Commission to require SWBT to answer the data requests as stated herein.

Respectfully submitted,

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